

1 Joel E. Tasca  
 Nevada Bar No. 14124  
 2 Andrew S. Clark  
 Nevada Bar No. 14854  
 3 BALLARD SPAHR LLP  
 1980 Festival Plaza Drive, Suite 900  
 4 Las Vegas, Nevada 89135  
 Telephone: 702.471.7000  
 5 Facsimile: 702.471.7070  
 tasca@ballardspahr.com  
 6 clarkas@ballardspahr.com

7 *Attorney for Defendant Rausch Sturm LLP*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 DIANA VELASCO,

11 Plaintiff,

12 v.

13 MIDLAND CREDIT MANAGEMENT,  
 14 INC. and RAUSCH STURM, LLP,

15 Defendants.

CASE NO. 2:22-cv-00210-APG-BNW

**STIPULATION AND ORDER TO  
 EXTEND TIME FOR DEFENDANT TO  
 RESPOND TO PLAINTIFF'S  
 COMPLAINT**

**(Second Request)**

16 Plaintiff Diana Velasco and Defendant Rausch Sturm LLP stipulate and agree  
 17 that Rausch Sturm LLP has up to and including April 8, 2022, to respond to  
 18 Plaintiff's Complaint (ECF No. 1). The parties have begun preliminary discussions in  
 19 an attempt to resolve the issues raised in Plaintiff's Complaint, and the additional  
 20 time will allow them to determine whether a resolution is possible without further  
 21 litigation. The current deadline to file a response is March 25, 2022. Therefore,  
 22 pursuant to LR IA 6-1, this stipulation is timely.

23 This is the second request for an extension, and it is made in good faith and  
 24 not for purposes of delay.

25 Dated: March 24, 2022

1 BALLARD SPAHR LLP

KAZEROUNI LAW GROUP APC

2 By: /s/ Andrew S. Clark

By: /s/ Gustavo Ponce

3 Joel E. Tasca, Esq.

Gustavo Ponce

4 Nevada Bar No. 14124

Nevada Bar No. 15084

5 Andrew S. Clark

6069 S. Fort Apache Street, Suite 100

6 Nevada Bar No. 14854

Las Vegas, Nevada 89148

7 1980 Festival Plaza Drive, Suite 900

gustavo@kazlg.com

8 Las Vegas, Nevada 89135

(702) 625-9392

9 *Attorneys for Defendant*

*Attorneys for Plaintiff*

10 *Rausch Sturm LLP*

BALLARD SPAHR LLP  
1980 Festival Plaza Drive, Suite 900  
Las Vegas, Nevada 89135  
702.471.7000 FAX 702.471.7070

11  
12  
13 ORDER

14 IT IS SO ORDERED:

15  
16   
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: March 25, 2022